

ORIGINAL

SPM
3/26/02

FILED
HARRISBURG, PA

MAR 25 2002

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

MARY E. D'ANDREA, CLERK
Per 9/18
Deputy Clerk

KEITH I. SCHORR and SUSAN
SCHORR, in their own right and as personal
representatives of the Estate of RYAN K. SCHORR,

Plaintiffs,

v.

WEST SHORE REGIONAL POLICE
DEPARTMENT, HOWARD DOUGHERTY,
CUMBERLAND COUNTY, ROBERT GORIL
and HOLY SPIRIT HOSPITAL,

Defendants.

JURY TRIAL DEMANDED

Judge Kane

NO.: 1:CV-01-0930

DEFENDANT HOLY SPIRIT HOSPITAL'S INITIAL DISCLOSURE STATEMENT

Pursuant to F.R.C.P. 26(a)(1), Defendant Holy Spirit Hospital hereby submits its Initial Disclosure Statement

I. Initial Disclosures

A. Persons with Knowledge:

Sarah Brooks, Director of Health Information Service
Holy Spirit Hospital

Dr. David Spurrier (ER physician who examined Schorr on 11/18/00)
Holy Spirit Hospital

Mercedes Brsicise (crisis worker who began initial 302 paperwork)
Holy Spirit Hospital

Candice Highfield (crisis worker who took entered room when Schorr escaped)
Holy Spirit Hospital

Carol Joerger, R.N (nurse ECU who interacted with Schorr)
Holy Spirit Hospital

Rodney Buckels, Sr (ECU tech)
Holy Spirit Hospital

Dr. DeLaCruz - psychiatrist who treated Schorr from 10/99-9/00
Holy Spirit Hospital

Steve Buccifero, Dir of Mental Health Services
Holy Spirit Hospital

Charles Sterling, Security Manager
Holy Spirit Hospital

Cory Graby (Security Guard)
Holy Spirit Hospital

Officer Harry Hart, Jr.
West Shore Regional Police Department

Officer Gary Berresford
West Shore Regional Police Department

Howard Dougherty, Police Chief
West Short Regional Police Department

Matt Gaumer
455 Meadow Drive
Wormleysburg, PA

B. Relevant Documents:

The Uniform Terms and Conditions Applicable to Cumberland-Perry Counties
Mental Health and Mental Retardation Program Contracts

Cumberland/Perry Counties Mental Health/Mental Retardation Program Master
Contract/Letter of Agreement with Holy Spirit Hospital Community Mental Health Center
7/1/00-6/30/01

Cumberland-Perry Counties Mental Health-Mental Retardation Program Contract
with Holy Spirit Community Mental Health Center dated 5/12/00

Security Videotape of Ryan Schorr dated 11/18/00

Holy Spirit Hospital Medical Chart of Ryan Schorr for 11/18/00

Schorr Holy Spirit Hospital Community Mental Health Center Medical Chart of Ryan

Self Reported Serious Event to Department of Health

HSH Incident Report - 6/17/99 re: Ryan Schorr

Ryan Schorr Holy Spirit Hospital Incident Report - 11/18/00 from 8:20 a.m. to 9:00 a.m. re:

Ryan Schorr Holy Spirit Hospital Incident Report - 11/18/00 from 9:09 a.m. to 9:30 a.m. re:

Holy Spirit Hospital Community Mental Health Center Procedures for: 302 Admission; Inpatient Services-Visitors, Visits by Former Patients; Elopement Precautions and Crisis Intervention Policy & Procedures for Psychiatric Emergencies, Management of Acutely Disturbed Patient in ECU

John R Dietz Emergency Center Policies for: Suicide Precautions; Management of the Psychiatric Patient in the Emergency Center; Crisis Patients; Management of the Acutely Disturbed Patient; ECU Seclusion Room

Holy Spirit Hospital General Operating Policy re: Red Alert Policy

302 Questions to Other Hospitals

Statement of Carol Joerger, R.N.

Statement of David J. Spurrier, M.D.

Various newspaper articles

Grand Jury Investigation Documents

Sentinel Event Meeting Notes (Privileged pursuant to the Pennsylvania Peer Review Statute)

C. Damages:

Not relevant.

D. Insurance Agreement:

MIIX, Medical Inter-Insurance Exchange. This will be supplemented.

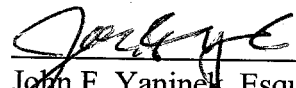
II. Disclosure of Expert Testimony

No decision on expert witnesses has yet been made.

Respectfully submitted,

METTE, EVANS & WOODSIDE

By:



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Attorneys for Defendant,
Holy Spirit Hospital

DATE: March 22, 2002

CERTIFICATE OF SERVICE

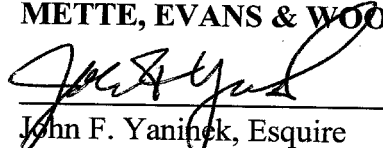
I, JOHN F. YANINEK, ESQUIRE, hereby certify that I am serving a copy of the foregoing document upon the person(s) and in the manner indicated below, which service satisfies the requirements of the Federal Rules of Civil Procedure, by depositing a copy of same in the United States Mail at Harrisburg, Pennsylvania, with first-class postage, prepaid, as follows:

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